

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

CRIMINAL NO. 22-342 (SCC)

[1] WANDA VÁZQUEZ GARCED,
[2] JULIO M. HERRERA VELUTINI,
[3] MARK T. ROSSINI,
Defendants.

**THE UNITED STATES' MOTION FOR LEAVE TO FILE REPLY AND EXTENSION
OF TIME UNTIL JULY 19, 2024 TO FILE**

The United States of America, by and through the undersigned, requests that the Court permit the United States to file a reply to Mr. Herrera's Opposition to the Government's Motion for a Protective Order. (ECF No. 587.) In support of this request, the government states as follows:

1. On June 24, 2024, the Government filed a brief motion requesting that the Court enter a Protective Order pursuant to CIPA Section 3. (ECF No. 583.) This request was based on several months of negotiation of terms of the proposed order and an acknowledgement that the parties could not agree on certain terms. *Id.*, p. 2.

2. On July 8, 2024, Mr. Herrera filed a response to the Government's motion and raised several legal issues concerning the authority of the Court to enter the Government's proposed order. (ECF No. 587, pp. 2-5.)

3. The Government would like the opportunity to reply to these legal issues – raised for the first time by Mr. Herrera – and further to consult with counsel for co-defendants regarding their position. Accordingly, the Government would request until July 19, 2024 to craft its response.

WHEREFORE, the United States requests that the Court permit the Government to file a reply to Mr. Herrera's Opposition and permit until July 19, 2024 to file such response.

RESPECTFULLY SUBMITTED, this 15th day of July 2024.

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S Department of Justice

/s/Nicholas W. Cannon
Nicholas W. Cannon
Trial Attorney (G01814)
Department of Justice
Public Integrity Section
1301 New York Ave., NW
10th Floor
Washington, D.C. 20530
(202) 514-8187
nicholas.cannon2@usdoj.gov